

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

JUANITA GARCIA, individually and on behalf  
of all others similarly situated,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC, a Delaware  
limited liability company,

Defendant.

NO. C15-1808 TSZ

**DECLARATION OF  
J. DOMINICK LARRY  
IN SUPPORT OF  
PLAINTIFF'S MOTION FOR  
CLASS CERTIFICATION**

NOTE ON MOTION CALENDAR:  
Friday, February 10, 2017

Pursuant to 18 U.S.C. § 1746, I, J. Dominick Larry, hereby declare and state as follows:

1. I am an attorney admitted to practice in the State of Illinois, and I have been admitted to practice *pro hac vice* before this Court for purposes of this action. I am entering this declaration in support of Plaintiff Juanita Garcia's Motion for Class Certification and is based upon my personal knowledge, except where expressly noted otherwise. If called upon to testify to the matters stated herein, I could and would competently do so.

2. I am an associate at the law firm Edelson PC, which has been retained to act as co-counsel for Plaintiff and the putative classes in this action.

1           3.       In response to Plaintiff's Notice of Rule 30(b)(6) Deposition, Defendant did not  
2 serve any objections, nor did it produce any loan instruments between itself and any absent class  
3 member. Instead, the only loan agreements produced to date are those relating to Plaintiff's  
4 mortgage.

5           4.       Attached hereto as Exhibit A is a true and accurate copy of a document purporting  
6 to be Defendant Nationstar Mortgage LLC's 2016 Form 10-K Statement, as downloaded from  
7 the SEC's EDGAR website.

8           5.       Attached hereto as Exhibit B is a true and accurate copy of Exhibit 2 to the  
9 Transcript of the Rule 30(b)(6) Deposition of Jon Thorpe II, which was produced by Defendant  
10 in this action.

11          6.       Attached hereto as Exhibit C is a true and accurate copy of the Transcript of the  
12 Rule 30(b)(6) Deposition of Courtney Ehinger.

13          7.       Attached hereto as Exhibit D is a true and accurate copy of the Transcript of the  
14 Rule 30(b)(6) Deposition of Jon Thorpe II.

15          8.       Attached hereto as Exhibit E is a true and accurate copy of a document produced  
16 by Defendant in discovery bearing bates number NSM/Garcia 000930.

17          9.       Attached hereto as Exhibit F is a true and accurate copy of the Transcript of the  
18 Deposition of Plaintiff Juanita Garcia.

19          10.       Attached hereto as Exhibit G are true and accurate copies of mortgage documents  
20 produced by Defendant in discovery bearing bates numbers NSM/Garcia 000049–141.

21          11.       Attached hereto as Exhibit H is a true and accurate copy of Defendant Nationstar  
22 Mortgage LLC's Responses to Plaintiff's Interrogatories.

23          12.       Attached hereto as Exhibit I is a true and accurate copy of Defendant Nationstar  
24 Mortgage LLC's Supplemental Responses to Plaintiff's Interrogatories.

25          13.       Attached hereto as Exhibit J is a true and accurate copy of the Transcript of the  
26 Rule 30(b)(6) Deposition of Jameson Bamrick.

15. Attached hereto as Exhibit L is Exhibit 6 to the Transcript of the Rule 30(b)(6) Deposition of Courtney Ehinger, which was produced by Defendant in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 23, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 23, 2016.

s/ J. Dominick Larry  
J. Dominick Larry

J. Dominick Larry

## Certificate of Service

I certify that, on the date stamped above, I caused this declaration and exhibits (some of which are under seal) to be filed with the Clerk of the Court via the CM/ECF system, which will cause notification of filing to be emailed to counsel of record for all parties.

s/ *Cliff Cantor*, WSBA # 17893